

From: [Benbow, Gene](#)
To: [Blake Hazen](#); [Blake Hazen](#)
Subject: Phone call last week
Date: Monday, November 04, 2013 8:27:00 AM

Hi Blake,

I was able to speak with several people in the branch about your ZP question (applying to citrus orchards to control ground squirrels...or possibly using bait stations). I also read over the SLITS response and though I agree the answer might not be 100% directive, there's not a lot more I can add to it. To me, it looks like CA's definition of "dormancy" will determine if/when the bait can be applied.

As far as bait station use goes, this is not a permitted application method on the label at present. Additionally, we aren't aware of any ZP products using bait stations to control ground squirrels. If this application method were proposed, it would likely qualify as a PRIA new use under FIFRA and would require data to demonstrate that ground squirrels can be effectively controlled using bait stations. From speaking with Bill Jacobs, it sounds like this might be tricky and would probably require pre-baiting in addition.

If you'd like to propose some different label language (vs. 'dormancy') specific to CA (or a region *within* CA) and you can convince CA to support it, we'd be happy to review it. We actually did just this a few weeks ago when CA raised the issue of "cover bait with overhanging grass and/or boards" in the Vole section of several ZP labels. They (CA) brought to our attention that being required to cover the bait was not consistent with good management practice in orchards, so we adopted the new language "when **practical**, cover bait with grasses....etc."

Obviously it isn't our intent to use label language that isn't useful to some applicators, but that's part of the challenge.

Sincerely,

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